



County of Santa Cruz

BOARD OF SUPERVISORS

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March 10, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Ajit Pai
Commissioner Jessica Rosenworcel
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Received & Inspected

MAR 16 2015

FCC Mail Room

DOCKET FILE COPY ORIGINAL

Re: COMCAST-TIME WARNER CABLE: DOCKET #14-57

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Pai,
Commissioner Rosenworcel, and Commissioner O'Rielly:

Today, 25% of all California and U.S. households do not have high-speed Internet access at home. This impacts the quality of life and economic vitality in all of our communities. It means that we are unable to reach 25% of our residents with public information and government services online, which could save us operating costs. It excludes 25% of our constituents from participating in today's democracy. As a local elected official, I am deeply concerned about this increasing disparity.

Federal law says there must be a finding of public benefit to approve the proposed Comcast acquisition of Time Warner Cable and exchange of service territory with Charter Communications. Therefore, I strongly urge you to require the following five recommendations if you approve the Comcast-TWC-Charter and/or other corporate consolidation:

1. **Include All Low-Income Households:** Extend Comcast Internet Essentials to all low-income households, not just those with school children. Require Charter and all companies resulting from corporate mergers or acquisitions to offer a similar affordable offer to all low-income households. Low-income seniors, people with disabilities, and returning veterans are not covered today.
2. **Set Performance Goals:** Set a goal for Comcast to increase Internet Essentials subscribership for expanded eligible households to reach 45% in 2 years, and to continue the program until 80% adoption is achieved in all low-income neighborhoods in each major market within the combined service territories. Set a similar goal for Charter and all other companies.

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3. **Capitalize an Independent Fund and Coordinate with States:** Work through and collaborate with states that have an adopted plan to close the Digital Divide. In states, such as California, that are major Comcast-TWC markets and have a strategic plan to close the Digital Divide, require Comcast to dedicate a sufficient amount to an independently-managed fund to engage experienced community-based organizations, libraries, and schools to assist in achieving the 45% subscription sign-ups and overall 80% adoption rate. Apply this same approach to states that become dominant Charter markets. The management of such a fund should be selected by a state agency through an open competitive process.
4. **Establish an Advisory Oversight Committee:** Establish a national advisory oversight committee to provide feedback and input to the FCC in monitoring performance and progress. The program has been riddled with problems and there is a lack of transparency on data regarding eligibility and progress. There must be a reliable process and mechanism for public accountability.
5. **Offer Stand-Alone Internet Service:** Require Comcast, Charter, and other merged companies to offer all consumers the opportunity to purchase stand-alone Internet access at a reasonable rate instead of being forced to pay for bundled services.

Now is the time to hold Comcast accountable for delivering a real, measurable public benefit. Our nation's economic well-being and ability to compete globally are at risk unless we get all residents connected to high-speed Internet access at home.

Thank you for your time and attention to this matter.

Sincerely,



BRUCE MCPHERSON, Supervisor
Fifth District

BAM:lg

cc: Sunne McPeak, President/CEO, California Emerging Technology Fund

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